

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

| | | |
|---------------------------|---|---------------------|
| UNITED STATES OF AMERICA, |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| v. |) | No. 4:14 CR 361 CDP |
| |) | |
| SHOICHI OKADA, |) | |
| |) | |
| Defendant. |) | |

**GOVERNMENT’S MOTION REGARDING FOREIGN PASSPORT FOR CRIMINAL
DEFENDANT SHOICHI OKADA**

Comes now the United States of America, by and through its attorneys, Richard G. Callahan, United States Attorney for the Eastern District of Missouri, and Robert F. Livergood, Assistant United States Attorney for said District, and files its motion regarding foreign passport for criminal defendant Shoichi Okada.

1. On November 4, 2014, defendant was charged by Complaint with one count of Possession of Child Pornography, a felony. Doc. # 1.
2. On November 4, 2014, U.S. Magistrate Judge Noce filed his order setting forth conditions of defendant’s release. Doc. #8. One of the conditions of release was that defendant surrender his passport to the Clerk of the Court. Doc. #8, ¶ (7)(d).
3. On November 5, 2015, an entry in the Court’s Minutes reflects that defendant’s passport was surrendered.
4. On November 12, 2014, defendant was charged by Indictment with one count of Possession of Child Pornography, a felony. Doc. #15.

5. On February 9, 2016, defendant pleaded guilty to the one count indictment and was sentenced. The Judgment was filed on the same date. Doc. #81.
6. Defendant is a Japanese citizen. Doc. #6, p. 2; Doc. #71, p. 2.
7. The defendant's passport and the Judgment should be sent to regional office of the U.S. Immigration and Customs Enforcement (ICE).
8. The defendant's deportation is being handled by officers in the St. Louis Office of (ICE). As a result, the Government requests that the Court order the Clerk of Court to send defendant's passport and the Judgment to the following:

Deportation Officer J.R. Hentz
DHS/ICE – ERO
1222 Spruce St.
Room 1.100
St. Louis, MO 63103.

Respectfully submitted,

RICHARD G. CALLAHAN
United States Attorney

s/ Robert F. Livergood
ROBERT F. LIVERGOOD, 35432MO
Assistant United States Attorney
111 S. 10th Street, Room 20.333
St. Louis, Missouri 63102
(314) 539-2200

CERTIFICATE OF SERVICE

I hereby certify that on March 2, 2016, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the following and that the below signed emailed the same to the following:

Mr. Daniel A. Juengel
Frank, Juengel & Radefeld
7710 Carondelet Ave., Suite 350
Clayton, MO 63105

s/Robert F. Livergood
ROBERT F. LIVERGOOD, #35432MO
Assistant United States Attorney